Claggett E. Ramsburg and Hilda L. Ramsburg, his wife, near Mt. Pleasant, Frederick County, Maryland

No. 452 Equity.

Vs.

The unknown heirs, devisees, personal representatives, descendants or successors in interest, of Henry N. Waters, deceased, and of Minnie J. Waters, widow, and of Charles Waters and of Isabella Waters, his wife

In the Circuit Court

for Frederick County.

## BILL OF COMPLAINT

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Your Orators, complaining, say:

FIRST: That they are the owners of two parcels of real estate situate, lying and being in Mt. Pleasant Election District, Frederick County, Maryland, the one containing fifteen acres and five square perches, more or less, and the other containing sixteen and one-fourth acres, more or less, being the same property that was conveyed to your Orators by Roy Lemaster and Edith P. Lemaster, his wife, and Mary A. Stevens, widow, by deed dated the 21st day of October, 1959, and recorded in Liber No. 625, folio 558, one of the Land Records for Frederick County, certified copy of said deed being filed herewith, prayed to be taken as a part hereof, and marked "Complainants' Exhibit No. 1".

SECOND: That the above described real estate is a portion of the property that was conveyed by Thomas H. Clarke and Jane Clarke, his wife, to Henry N. Waters, a predecessor in title to your Orators, by deed dated the 8th day of March, 1922, and recorded in Liber No. 338, folio 128, one of the Land Records for Frederick County, a certified copy of such deed being filed herewith and prayed to be taken as a part hereof and marked "Complanants' Exhibit No. 2"; that Henry N. Waters and Minnie J. Waters, his wife, did convey an undivided one-half interest in such property to Charles Waters by deed dated the 24th day of August, 1922, and recorded in Liber No. 340, folio 189, one of the Land Records for Frederick County, a certified copy of which

ROBERT E. CLAPP, JR.
ATTORNEY AT LAW
FREDERICK, MARYLAND